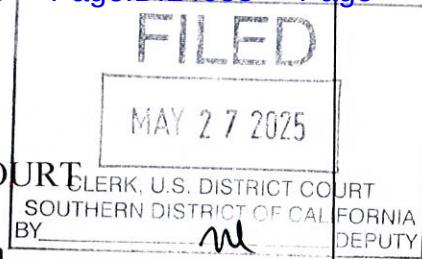


## IN THE UNITED STATES DISTRICT COURT

2 For the Southern District of California



3 SECURITIES AND EXCHANGE )  
4 COMMISSION )  
5 Plaintiff, )  
6 v. ) Case No. 02cv84 DMS (RBB)  
7 JAMES E. FRANKLIN, )  
8 Defendant. )

9 **NOTICE OF NON-STIPULATION TO PLAINTIFF'S MOTION FOR**  
10 **CONTINUANCE OF HEARING DATE**

11

12 1. Defendant James E. Franklin hereby notifies the Court that he does **not stipulate to**  
13 Plaintiff Securities and Exchange Commission's Motion to Continue the Hearing Date on  
14 Defendant's pending Rule 60(b) Motion and Motion to Vacate Penny Stock Bar (ECF  
15 No. 489).

16 2. Although Plaintiff SEC reached out by email on May 20, 2025, to solicit Defendant's  
17 position, Defendant was unavailable due to a scheduled medical appointment and did not  
18 receive the communication until the morning of May 21. By that time, Plaintiff had  
19 already filed its Motion for Continuance—less than 24 hours after outreach—without  
20 affording Defendant a meaningful opportunity to respond or confer.

21 3. Defendant is disappointed that the Commission proceeded unilaterally rather than  
22 engaging in reciprocal dialogue. Defendant advised SEC counsel on May 21 that he  
23 would be willing to consider a one-week continuance **only if the SEC agreed to**  
24 **promptly initiate good-faith settlement discussions**, which would reflect mutual

1 cooperation and fairness given the long procedural history of the case and the equities  
2 now at issue.

3 4. To date, Plaintiff has not agreed to those terms, and thus **no stipulation exists.**  
4 5. Accordingly, Defendant will file a Limited Opposition to the Motion for Continuance and  
5 respectfully defers to the Court on whether the SEC has demonstrated sufficient cause for  
6 its requested extension.

7  
8 Respectfully submitted,

9  
10 Dated: May 20, 2025  
11

12   
13

14 **James E. Franklin**  
15 Defendant, Pro Se  
16 1212 H Street, No. 125  
17 Ramona, CA 92065  
18 jayvonfrank@gmail.com  
19 (720) 771-0140  
20  
21  
22  
23  
24  
25  
26  
27  
28

**IN THE UNITED STATES DISTRICT COURT  
For the Southern District of California**

**SECURITIES AND EXCHANGE )  
COMMISSION )  
Plaintiff, )  
v. )  
JAMES E. FRANKLIN, )  
Defendant. )**

) Case No. 02cv84 DEM (RBB)

## **CERTIFICATE OF MAILING**

**I, James E. Franklin, declare that on May 20th, 2025, I caused true and correct copies of the following document:**

**1. NOTICE OF NON-STIPULATION TO PLAINTIFF'S MOTION FOR  
CONTINUANCE OF HEARING DATE**

**Clerk of the Court**  
U.S. District Court – Southern District of California  
333 West Broadway, Suite 420  
San Diego, CA 92101

**James P. Connor, Esq.**  
Securities and Exchange Commission  
Los Angeles Regional Office  
444 S. Flower Street, Suite 900  
Los Angeles, CA 90071  
Email: connorja@sec.gov (*copy also sent by email as courtesy*)

**Department of Justice – Civil Division**  
Federal Programs Branch  
1100 L Street NW  
Washington, DC 20005

1  
2  
3 I declare under penalty of perjury that the foregoing is true and correct.  
4  
5  
6  
7

Executed on this 20th day of May 2025

James E. Franklin

James E. Franklin

Defendant, Pro Se

1212 H Street, #125

Ramona, CA 92065

720-771-0140

[jayvonfrank@gmail.com](mailto:jayvonfrank@gmail.com)

## IN THE UNITED STATES DISTRICT COURT

For the Southern District of California

FILED
MAY 27 2025
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY <i>nl</i>
DEPUTY

3 SECURITIES AND EXCHANGE )  
4 COMMISSION )  
5 Plaintiff, )  
6 )  
7 v. ) Case No. 02cv84 DMS (RBB)  
8 )  
9 JAMES E. FRANKLIN, )  
10 Defendant. )

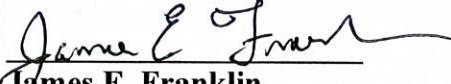
9 **NOTICE OF LODGMENT OF SUPPLEMENTAL EVIDENCE IN SUPPORT OF**  
10 **MOTION FOR RELIEF FROM JUDGMENT (FRCP 60(b))**

12 1. Defendant James E. Franklin hereby lodges the following document in support of the  
13 pending Rule 60(b) motion:

14 2. **Exhibit 1:** Declaration of **Adina Lawson**, dated May 19, 2025, confirming the  
15 authenticity of Exhibits F–H submitted with the original motion (letters authored by  
16 Stephan Jan Meyers).

18 Respectfully submitted,

19 Dated: May 20th, 2025

20   
21 **James E. Franklin**

22 Pro Se Defendant  
1212 H Street, SPC #125  
23 Ramona, CA 92065  
24 jayvonfrank@gmail.com

## EXHIBIT 1

### DECLARATION OF ADINA LAWSON

(In Support of Motion for Relief from Judgment – Fed. R. Civ. P. 60(b))

I, **Adina Lawson**, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am the surviving spouse of **Stephan Jan Meyers**, a former attorney and enforcement official with the U.S. Securities and Exchange Commission. My husband passed away on **March 8, 2025**.
2. I was married to Stephan from **2012 until his death in 2025**, and I was closely familiar with his handwriting, professional work habits, and correspondence style throughout our marriage.
3. I have reviewed the following documents attached to Mr. James E. Franklin's motion for relief:
  - A letter dated **March 11, 2004**, addressed to the Director of Enforcement at the SEC.
  - A letter and supplemental memorandum dated **June 29, 2007**, addressed to the SEC Commissioners.
4. I personally recognize the handwriting, language, formatting, and authorship of these documents as consistent with my husband's legal writing and professional voice.
5. I recall my husband discussing Mr. Franklin's case at length during our marriage. He often expressed frustration with how the matter was handled and was especially troubled by what he saw as misconduct or abuse of discretion by the SEC's trial team.
6. In February 2025, shortly before his death, Stephan told me that he had recently spoken to Mr. Franklin and encouraged him to revisit the case. He was hopeful that recent changes in law and increased attention to SEC misconduct would allow Mr. Franklin an opportunity to obtain post-judgment relief.
7. I make this declaration to support the authenticity and admissibility of my husband's writings.
8. I declare under the penalty of perjury that the foregoing is true and correct.

Executed on this 19th day of May, 2025  
at Palm Desert, California.



Adina Lawson

IN THE UNITED STATES DISTRICT COURT  
For the Southern District of California

SECURITIES AND EXCHANGE )  
COMMISSION )  
Plaintiff, )  
 )  
v. ) Case No. 02cv84 DEM (RBB)  
 )  
JAMES E. FRANKLIN, )  
Defendant. )

## CERTIFICATE OF MAILING

**I, James E. Franklin, declare that on May 20th, 2025, I caused true and correct copies of the following document:**

**NOTICE OF LODGMENT OF SUPPLEMENTAL EVIDENCE IN SUPPORT OF  
MOTION FOR RELIEF FROM JUDGMENT (FRCP 60(b))**

**Clerk of the Court**  
U.S. District Court – Southern District of California  
333 West Broadway, Suite 420  
San Diego, CA 92101

**James P. Connor, Esq.**  
Securities and Exchange Commission  
Los Angeles Regional Office  
444 S. Flower Street, Suite 900  
Los Angeles, CA 90071

**Department of Justice – Civil Division**  
Federal Programs Branch  
1100 L Street NW  
Washington, DC 20005

1  
2 I declare under penalty of perjury that the foregoing is true and correct.  
3  
4 Executed on this 20th day of May 2025  
5  
6

  
7 **James E. Franklin**

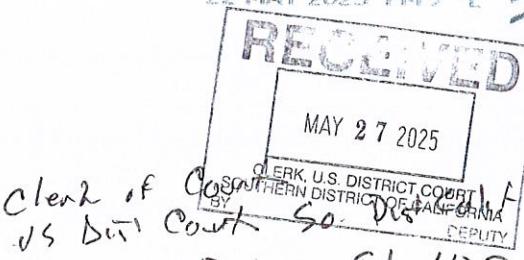
8 Defendant, Pro Se

9 1212 H Street, #125

10 Ramona, CA 92065

11 720-771-0140

12 jayvonfrank@gmail.com

TAMPA FL 335  
SAINT PETERSBURG FL  
22 MAY 2025 PM 7 L

92101-380620

